

# **EXHIBIT A**

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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IN RE: NEW ENGLAND COMPOUNDING  
PHARMACY, INC. ET AL.  
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1:15-cv-12728-RWZ

**NECC POST-CONFIRMATION OFFICER’S NOTICE OF NO OPPOSITION TO  
MOTION OF THE NECC POST-CONFIRMATION OFFICER FOR PARTIAL  
WITHDRAWAL OF THE REFERENCE IN CONNECTION WITH THE  
IMPLEMENTATION OF THE THIRD AMENDED JOINT PLAN OF  
REORGANIZATION OF NEW ENGLAND COMPOUNDING PHARMACY, INC.**

Paul D. Moore, in his capacity as the Post-Confirmation Officer of New England Compounding Pharmacy, Inc. d/b/a New England Compounding Center, hereby gives notice that the time for any party to oppose his Motion for Partial Withdrawal of the Reference in Connection with the Implementation of the Third Amended Joint Plan of Reorganization of New England Compounding Pharmacy, Inc. (ECF. No. 1, Docket No. 1:15-cv-12728-RWZ)(“Motion for Partial Withdrawal of the Reference”) has passed without the filing of any opposition, and therefore, he respectfully requests that this Court grant his motion. Specifically, the Post-Confirmation Officer states as follows:

On June 12, 2015, pursuant to Rule 5011-1 of the Local Rules of the United States Bankruptcy Court for the District of Massachusetts, the Post-Confirmation Officer filed his Motion for Partial Withdrawal of the Reference in the United States Bankruptcy Court for the District of Massachusetts, Eastern Division (ECF No. 1381, Bankruptcy Court Docket No. 12-19882-HJB). The Post-Confirmation Officer filed a Notice of his filing of the Motion for Partial Withdrawal of the Reference, along with a copy of his motion, in the Multi-District Litigation

Proceedings (the “MDL”) pending in this Court on June 12, 2015 (ECF No. 1962, Docket No. 1:13-md-02419).

On June 22, 2015, the Bankruptcy Court transmitted the Post-Confirmation Officer’s Motion for Partial Withdrawal of the Reference to this Court (ECF. No. 1388, Docket No. 12-19882-HJB; ECF. No. 1, Docket No. 1:15-cv-12728-RWZ). Accordingly, any opposition to the Motion for Partial Withdrawal of the Reference was due to be filed no later than Monday, July 6, 2015.

Also on June 22, 2015, the Plaintiffs’ Steering Committee (“PSC”) filed its proposed agenda for the June 24, 2015 MDL Status Conference (ECF No. 2002, Docket No. 1:13-md-02419-RWZ). The Post-Confirmation Officer’s Motion for Partial Withdrawal of the reference appeared on the PSC’s proposed Agenda as Item B(4)(b). The MDL Status Conference proceeded as scheduled for June 24, 2015, and, among other things, the parties to the MDL discussed the Motion for Partial Withdrawal of the Reference.

As of the date of this filing, no party has filed an opposition to the Motion for Partial Withdrawal of the Reference.

For the reasons set forth more fully above, the Post-Confirmation Officer hereby gives notice that there is no opposition to his Motion for Partial Withdrawal of the Reference. Accordingly, for the reasons more fully set forth in his Motion for Partial Withdrawal of the Reference (ECF. No. 1, Docket No. 1:15-cv-12728-RWZ), the Post-Confirmation Officer respectfully requests that this Court grant his Motion for Partial Withdrawal of the Reference.

Dated: July 16, 2015  
Boston, Massachusetts

DUANE MORRIS LLP

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**Certificate of Service**

I, Michael R. Gottfried, hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on July 16, 2015.

/s/Michael R. Gottfried  
Michael R. Gottfried